

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

Track One Cases

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**AMERISOURCEBERGEN DRUG CORPORATION'S
SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFFS'
COMBINED DISCOVERY REQUESTS**

Pursuant to the Court's Order dated November 21, 2018, AmerisourceBergen Drug Corporation (ABDC) re-asserts and supplements its responses to Plaintiffs' Combined Discovery Requests.

Contrary to representations made by the Plaintiffs Executive Committee (PEC) at the hearing before the Court on November 20, 2018, ABDC already provided substantive responses to Plaintiffs' (First) Combined Discovery Requests on July 31, 2018. Pursuant to the direction of Special Master Cohen, ABDC's responses identified documents produced by ABDC that contain responsive information. At no time prior to the November 20, 2018 hearing did the PEC, or ABDC's assigned discovery handlers, contend that ABDC's responses to Plaintiffs' Combined Discovery Requests were deficient.

The PEC's suggestion that ABDC has not produced information relating to its Suspicious Order Monitoring System (SOMS) is simply wrong. As set forth below, ABDC has produced a significant amount of detailed information relating to its SOMS; that previously-produced information is directly responsive to the below requests. *See* ABDC Production Log attached hereto. Notably, on June 1, 2018, ABDC produced a twenty-five page Memorandum (Bates

Nos. ABDCMDL00004578-4602) that described in detail the operations and functionality of both ABDC's Legacy (Past) Diversion Control Program (2007-2014) and Current Diversion Control Program (2014 to the present). This Memorandum – which Plaintiffs have possessed for almost *six months* – provides a narrative description, along with 502 pages of corresponding exhibits, reflecting, among other things, ABDC's Policies and Procedures, Training and Education, New Customer Due Diligence, Order Monitoring Program, Resource and Oversight, Ongoing Monitoring and External Review that were associated with both the Legacy and Current Diversion Control Programs. *See* ABDCMDL00004603-5104.

In addition, ABDC has searched for, identified and already produced to Plaintiffs documents relating to ABDC's SOMS in effect from approximately 1998 to 2007, including, but not limited to, communications with the DEA in which DEA grants approval for that 1998 system. *See* ABDCMDL00269347-269358.

Finally, ABDC has made available (and continues to make available) its employees (current and former) from the Corporate Securities and Regulatory Affairs Department who are (or were) responsible for ABDC's diversion control programs:

Name	Title	Deposition Date
Chris Zimmerman	Senior Vice President of Corporate Security & Regulatory Affairs and Chief Compliance Officer (formerly Vice President of Corporate Security & Regulatory Affairs)	August 4, 2018
David May	Vice President of Diversion Control & Security (formerly Senior Director, Diversion Control & Federal Investigations)	August 3, 2018
Steve Mays	Senior Director, Corporate Security & Regulatory Affairs	October 24, 2018

Name	Title	Deposition Date
Edward Hazewski	Director of Diversion Control & Security (formerly Manager of the Diversion Control Program (2008-2016) and Director Security Systems & Services (2016-2018))	October 25, 2018
Bruce Gundy	Director of Investigations & Security	November 7, 2018
Eric Cherveny	Director of Diversion Control & Security	November 9, 2018
Sharon Hartman	Director of Pharmacy Compliance & Diversion Control	November 29, 2018
Kevin Kreutzer	Diversion Control Investigator	November 27, 2018
Nikki Seckinger	Diversion Control Investigator	December 12, 2018 (confirmed)
Elizabeth Garcia	Diversion Control Investigator (former)	December 14, 2018 (confirmed)

Plaintiffs have deposed (or will depose) these witnesses and have obtained hours of testimony from these witnesses concerning the functionality of ABDC's diversion control programs. In particular, Chris Zimmerman and David May, who were deposed as both fact and 30(b)(6) witnesses, were designated and deposed as corporate witnesses on a wide range of topics relating to ABDC's SOMS for the period of 2006 to 2018. Thus, there is absolutely no basis for PEC's suggestion to the Court that ABDC has not already provided information about its diversion control programs.

In addition to the above, ABDC supplements its responses to Nos. 2-7 of Plaintiffs' Combined Discovery Requests as follows.

OBJECTIONS AND RESPONSES

ABDC incorporates herein by reference its General Objections, Objections to Definitions and Instructions, and Reservation of Rights as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

COMBINED DISCOVERY REQUESTS

Request No. 2. Please produce each of your *Suspicious Order Monitoring System (SOMS)* policies and procedures since January 1, 2006 and identify the Bates stamp range for each; please identify the effective date(s) each was in force and effect.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced its Order Monitoring Program policies and procedures in effect during the period from January 1, 2006 to May 29, 2018 at ABDCMDL00000011-ABDCMDL00000190; ABDCMDL00002169-ABDCMDL00002231; ABDCMDL00002261-ABDCMDL00002440; ABDCMDL00002642-ABDCMDL00002704; ABDCMDL00002713-ABDCMDL00002785; ABDCMDL00003039-ABDCMDL00003087; ABDCMDL00003089-ABDCMDL00003115; ABDCMDL00003117-ABDCMDL00003135; ABDCMDL00003220-ABDCMDL00003355; ABDCMDL00003367-ABDCMDL00003502; ABDCMDL00003686-ABDCMDL00003746; ABDCMDL00003949-ABDCMDL00004095; ABDCMDL00004264-ABDCMDL00004326; ABDCMDL00004481-ABDCMDL00004553; ABDCMDL00017004-ABDCMDL00017085; ABDCMDL00035379-ABDCMDL00035408; ABDCMDL00035418-

ABDCMDL00035430; ABDCMDL00035445-ABDCMDL00035461; ABDCMDL00035500-ABDCMDL00035529; ABDCMDL00035535-ABDCMDL00035537; ABDCMDL00035707-ABDCMDL00035709; ABDCMDL00037316-ABDCMDL00037400; ABDCMDL00169890-ABDCMDL00170123; ABDCMDL00172093-ABDCMDL00172134; ABDCMDL00355517-ABDCMDL00355598; ABDCMDL00355611-ABDCMDL00355620; ABDCMDL00359842-ABDCMDL00360025; ABDCMDL00360029-ABDCMDL00360034; ABDCMDL00360182-ABDCMDL00360193; ABDCMDL00360208-ABDCMDL00360228; ABDCMDL00360276-ABDCMDL00360313; ABDCMDL00364267-ABDCMDL00364390.¹

Request No. 3. Please identify and describe each *suspicious order* your Suspicious Order Monitoring System (SOMS) identified since January 1, 2006 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an

¹ In addition to the above-listed documents, responsive documents found within custodial files have also been produced.

order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced Documents sufficient to identify orders flagged by ABDC's Order Monitoring Program for further review, as well as orders that were determined to be suspicious and reported to the DEA, from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to the DEA prior to July 1, 2007.

Request No. 4. Please identify each suspicious order you ***reported*** to the DEA since January 1, 1996 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to

any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs.

Subject to and without waiving its objections, to the extent that it possesses such information or that such information can be retrieved without unreasonable burden, for the period from July 1, 2007 to May 29, 2018, ABDC has produced Documents sufficient to identify suspicious orders reported to the DEA relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). In addition to the above-listed documents, responsive documents can be found within ABDC's productions of the CSRA Share Drive, LawTrac, Matter Management System, Tableau files, and custodial files. After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to DEA prior to July 1, 2007.

Request No. 5. For each suspicious order you identified but did not report to the DEA since January 1, 2006, please describe in as much detail as possible the reasons and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined

Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, ABDC states that it reports all orders determined to be suspicious to the DEA, and that after reasonable investigation, it is not aware of any orders identified as suspicious that were not reported to DEA. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by ABDC's Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit

County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

Request No. 6. For each suspicious order your reported to the DEA since January 1, 2006, please identify whether you declined the order or *shipped* the order and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious." ABDC further objects to this Request to the extent it suggests that there is a "Shipping Requirement" in the relevant federal regulations.

Subject to and without waiving its objections, ABDC states that after reasonable investigation, for the period from July 1, 2007 to May 29, 2018, it is not aware of any orders determined to be suspicious that were shipped to a customer. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by ABDC's

Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00279836-ABDCMDL00279838 (2012-2018: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00279840-ABDCMDL00279841 (2007-2012: Summit County); ABDCMDL00279843-ABDCMDL00279844 (2007-2012: Cuyahoga County); ABDCMDL00279846-ABDCMDL00279847 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2007-2012: Cuyahoga County, Summit County, City of Cleveland); ABDCMDL00355865 (April 2018-May 2018: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

Request No. 7. For each suspicious order you reported and then shipped since January 1, 2006, please produce all documents related to your "*due diligence*" for each; please identify the Bates stamp range for each related to *Case Track One*.

RESPONSE:

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Request to the extent it suggests that there is a "Shipping Requirement" in the relevant federal regulations.

Subject to and without waiving its objections, ABDC incorporates by references its response to Combined Discovery Request No. 6. After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007. ABDC further states that after reasonable investigation, for the period from July 1, 2007 to May 29, 2018, it is not aware of any orders identified as suspicious that were shipped to a customer.

Dated: November 30, 2018

Respectfully submitted,

/s Robert A. Nicholas

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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2018, the foregoing was sent by electronic mail to Counsel for the Plaintiffs and Defendants as follows:

Plaintiffs' Designated Distribution List:

mdl2804discovery@motleyrice.com

Defendants' Designated Distribution List:

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/s Robert A. Nicholas

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MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL001	ABDCMDL00000001	ABDCMDL000002155	Prior Production: Multistate Attorneys General	6/1/2018
ABDCMDL_VOL002	ABDCMDL000002156	ABDCMDL000002248	Prior Production: New Hampshire Attorney General	6/1/2018
ABDCMDL_VOL003	ABDCMDL000002249	ABDCMDL000002256	Prior Production: Mississippi Board of Pharmacy	6/1/2018
ABDCMDL_VOL004	ABDCMDL000002257	ABDCMDL000002260	Prior Production: Mississippi Attorney General	6/1/2018
ABDCMDL_VOL005	ABDCMDL000002261	ABDCMDL000002639	Prior Production: New Jersey Attorney General	6/1/2018
ABDCMDL_VOL006	ABDCMDL000002640	ABDCMDL000003219	Prior Production: Indiana Attorney General	6/1/2018
ABDCMDL_VOL007	ABDCMDL000003220	ABDCMDL000003366	Prior Production: Lake County, IL State's Attorney's Office	6/1/2018
ABDCMDL_VOL008	ABDCMDL000003367	ABDCMDL000003746	Prior Production: Alaska Attorney General	6/1/2018
ABDCMDL_VOL009	ABDCMDL000003747	ABDCMDL000003748	Prior Production: United States Senate Committee on Homeland Security and Governmental Affairs	6/1/2018
ABDCMDL_VOL010	ABDCMDL000003749	ABDCMDL000004230	Prior Production: United States House of Representatives Committee on Energy and Commerce	6/1/2018

MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Number	Description	Produced
ABDCMDL_VOL011	ABDCMDL00004231	ABDCMDL00005106	Prior Production: South Carolina Attorney General	6/11/2018
ABDCMDL_VOL012	ABDCMDL00005107	ABDCMDL00017003	Prior Production: DOJ and DEA Subpoena from District of New Jersey	6/11/2018
ABDCMDL_VOL013	ABDCMDL00017004	ABDCMDL00035365	Prior Production: DOJ and DEA Subpoena from Denver, CO Field Office	6/11/2018
ABDCMDL_VOL014	ABDCMDL00035366	ABDCMDL00037251	Prior Production: <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.)	6/11/2018
ABDCMDL_VOL015	ABDCMDL00037252	ABDCMDL00037315	Prior Production: Multistate Attorneys General	6/11/2018
ABDCMDL_VOL016	ABDCMDL00037316	ABDCMDL00037401	Prior Production: DOJ and DEA Subpoena from Northern District of West Virginia	6/11/2018
ABDCMDL_VOL017	ABDCMDL00037402	ABDCMDL00037418	Documents responsive to MDL Plaintiffs’ Requests for Production Nos. 32-33 and Interrogatory No. 3	6/11/2018
ABDCMDL_VOL018	ABDCMDL00037419	ABDCMDL00037427	Prior Production: Privilege logs produced in connection with documents productions responsive to Paragraph 9(k)(ii) of MDL CMO No. 1	6/11/2018

MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Number	Description	Produced
ABDCMDL_VOL019	ABDCMDL00037428	ABDCMDL00043354	Insurance agreements and insurance coverage charts	6/14/2018
ABDCMDL_VOL020	ABDCMDL00043355	ABDCMDL00044996	Documents responsive to MDL Plaintiffs’ Requests for Production and Interrogatories	7/3/2018
ABDCMDL_VOL021	ABDCMDL00044997	ABDCMDL00047016	Distribution agreements between ABDC and pharmaceutical manufacturers; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for the State of Ohio for 2007-2017; Deposition transcripts and exhibits from <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.).	7/13/2018
ABDCMDL_VOL022	ABDCMDL00047017	ABDCMDL00155325	Custodial files from Eric Cherveny	7/20/2018
ABDCMDL_VOL023	ABDCMDL00155326	ABDCMDL00169849	Custodial files from David May	7/20/2018
ABDCMDL_VOL024	ABDCMDL00169850	ABDCMDL00172134	ABDC Annual Plans; Track One Customer Order Monitoring Program Thresholds; Industry Group Payment Information; Files collected from Corporate Security and Regulatory Affairs Share Drive	7/20/2018
ABDCMDL_VOL025	ABDCMDL00172135	ABDCMDL00248588	Custodial files from Eric Cherveny	7/27/2018
ABDCMDL_VOL026	ABDCMDL00248589	ABDCMDL00264103	Custodial files from David May	7/27/2018

MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL027	ABDCMDL00264104	ABDCMDL00279650	Custodial files from Chris Zimmerman	7/27/2018
ABDCMDL_VOL028	ABDCMDL00279651	ABDCMDL00279853	Suspicious Order Reports to Ohio BOP; Track One Customer Order Monitoring Program Thresholds; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for Track One Customers	7/27/2018
ABDCMDL_VOL024a	ABDCMDL00169888	ABDCMDL00169888	Replacement copy of native file spreadsheet containing errant “Privileged & Confidential – Attorney Client Work Product” footer	7/30/2018
ABDCMDL_VOL029	ABDCMDL00279854	ABDCMDL00279865	Settlement and Release Agreement entered into between DEA and ABDC	7/30/2018
ABDCMDL_VOL023_Clawback; ABDCMDL_VOL025_Clawback; ABDCMDL_VOL030	ABDCMDL00279866	ABDCMDL00279884	Claw back and reproduction of documents pursuant to August 2, 2018 letter	8/2/2018
ABDCMDL_VOL_Clawback24; ABDCMDL_VOL_Clawback26; ABDCMDL_VOL_Clawback27; ABDCMDL_VOL031	ABDCMDL00279885	ABDCMDL00280022	Claw back and reproduction of documents pursuant to August 3, 2018 letter	8/4/2018
ABDCMDL_VOL026_CLAWBACK; ABDCMDL_VOL027_CLAWBACK; ABDCMDL_VOL027_OVERLAY_ CLAWBACKS ² ; ABDCMDL_VOL032	ABDCMDL00280023	ABDCMDL00280046	Claw back and reproduction of documents pursuant to August 10, 2018 letter	8/14/2018

MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Number	Description	Produced
ABDCMDL_VOL033	ABDCMDL00280047	ABDCMDL00280635	Track One Customer Due Diligence Files; Track One Customer Prime Vendor Agreements	8/14/2018
ABDCMDL_VOL034	ABDCMDL00280636	ABDCMDL00281093	Custodial files from Ed Hazewski	8/17/2018
ABDCMDL_VOL035	ABDCMDL00281094	ABDCMDL00281211	Custodial files from Eric Cherveny	8/17/2018
ABDCMDL_VOL036	ABDCMDL00281212	ABDCMDL00281307	Files collected from Corporate Security and Regulatory Affairs Share Drive	8/17/2018
ABDCMDL_VOL037	ABDCMDL00281308	ABDCMDL00282047	Track One Customer Due Diligence Files	8/17/2018
ABDCMDL_VOL038	ABDCMDL00282048	ABDCMDL00282071	Track One Customer Due Diligence Files	8/24/2018
ABDCMDL_VOL039	ABDCMDL00282072	ABDCMDL00282757	Custodial files from Ed Hazewski	8/24/2018
ABDCMDL_VOL040	ABDCMDL00282758	ABDCMDL00285562	Custodial files from Steve Mays	8/24/2018
ABDCMDL_VOL041	ABDCMDL00285563	ABDCMDL00287855	Custodial files from Ed Hazewski	8/31/2018
ABDCMDL_VOL042	ABDCMDL00287856	ABDCMDL00289536	Custodial files from Steve Mays	8/31/2018
ABDCMDL_VOL043	ABDCMDL00289537	ABDCMDL00291162	Custodial files from Sharon Hartman	8/31/2018
ABDCMDL_VOL044	ABDCMDL00291163	ABDCMDL00295167	Custodial files from Steve Mays	9/7/2018
ABDCMDL_VOL045	ABDCMDL00295168	ABDCMDL00295613	Custodial files from Sharon Hartman	9/7/2018
ABDCMDL_VOL046	ABDCMDL00295614	ABDCMDL00298458	Custodial files from Elizabeth Garcia	9/7/2018
ABDCMDL_VOL048	ABDCMDL00298788	ABDCMDL00300250	Custodial files from Emily Coldren	9/20/2018
ABDCMDL_VOL049	ABDCMDL00300251	ABDCMDL00301209	Custodial files from Steve Mays	9/20/2018
ABDCMDL_VOL050	ABDCMDL00301210	ABDCMDL00302542	Files collected from Corporate Security and Regulatory Affairs Share Drive; 2006 Cuyahoga County transactional data	9/21/2018
ABDCMDL_VOL051	ABDCMDL00302543	ABDCMDL00304902	Custodial files from Kevin Kreutzer	9/21/2018

MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Number	Description	Produced
ABDCMDL_VOL022_Clawback; ABDCMDL_VOL023_Clawback02; ABDCMDL_VOL024_Clawback02; ABDCMDL_VOL025_Clawback02; ABDCMDL_VOL026_Clawback03	ABDCMDL00298653	ABDCMDL00298787	Claw back and reproduction of documents pursuant to September 25, 2018 letter	9/25/2018
ABDCMDL_VOL052	ABDCMDL00304903	ABDCMDL00306357	Custodial files from Eric Cherveny	9/27/2018
ABDCMDL_VOL034R	ABDCMDL00280636	ABDCMDL00281093	Replacement production of ABDCMDL_VOL034 originally produced on August 17, 2018	9/27/2018
ABDCMDL_VOL053	ABDCMDL00306358	ABDCMDL00306727	Custodial files from Ed Hazewski	9/28/2018
ABDCMDL_VOL054	ABDCMDL00306728	ABDCMDL00306729	2005 Cuyahoga County transactional data	9/28/2018
ABDCMDL_VOL055	ABDCMDL00306730	ABDCMDL00308067	2006 Summit County transactional data	9/28/2018
ABDCMDL_VOL056	ABDCMDL00308068	ABDCMDL00308071	2005 Summit County transactional data; Additional CSRA Reports from Legacy OMP	10/5/2018
ABDCMDL_VOL057	ABDCMDL00308072	ABDCMDL00313547	Custodial files from Steve Mays	10/10/2018
ABDCMDL_VOL058	ABDCMDL00313548	ABDCMDL00313652	Custodial files from Eric Cherveny	10/11/2018
ABDCMDL_VOL059	ABDCMDL00313653	ABDCMDL00313654	2004 Cuyahoga and Summit County transactional data	10/12/2018
ABDCMDL_VOL060	ABDCMDL00313655	ABDCMDL00315005	Custodial files from Bruce Gundy	10/22/2018
ABDCMDL_VOL061	ABDCMDL00315006	ABDCMDL00315782	Custodial files from Nikki Seckinger	10/22/2018
ABDCMDL_VOL062	ABDCMDL00315783	ABDCMDL00316110	Hard copy documents reflecting communications with the DEA	10/23/2018
ABDCMDL_VOL063	ABDCMDL00316111	ABDCMDL00316114	June 1, 2002 to December 31, 2003 Cuyahoga and Summit County transactional data	10/23/2018
ABDCMDL_VOL064	ABDCMDL00316115	ABDCMDL00316680	Custodial files from David May	10/24/2018
ABDCMDL_VOL065	ABDCMDL00316681	ABDCMDL00316952	Custodial files from Chris Zimmerman	10/24/2018
ABDCMDL_VOL066	ABDCMDL00316953	ABDCMDL00317472	Custodial files from Elizabeth Garcia	10/24/2018
ABDCMDL_VOL067	ABDCMDL00317473	ABDCMDL00317898	Custodial files from Kevin Kreutzer	10/24/2018

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ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL VOL068	ABDCMDL00317899	ABDCMDL00318209	Custodial files from Emily Coldren	10/24/2018
ABDCMDL VOL069	ABDCMDL00318210	ABDCMDL00318356	Custodial files from Sharon Hartman	10/25/2018
ABDCMDL VOL070	ABDCMDL00318357	ABDCMDL00318377	Custodial files from Teresa Javier	10/25/2018
ABDCMDL VOL071	ABDCMDL00318378	ABDCMDL00318830	Custodial files from Nathan Elkins	10/25/2018
ABDCMDL VOL072	ABDCMDL00318831	ABDCMDL00319191	Custodial files from Damacio Rodriguez	10/25/2018
ABDCMDL VOL073	ABDCMDL00319192	ABDCMDL00319262	Custodial files from Gabriel Weissman	10/25/2018
ABDCMDL VOL074	ABDCMDL00319263	ABDCMDL00319410	Custodial files from Amy Illig	10/25/2018
ABDCMDL VOL075	ABDCMDL00319411	ABDCMDL00319585	Custodial files from Kayla Kessler	10/25/2018
ABDCMDL VOL076	ABDCMDL00319586	ABDCMDL00319720	Custodial files from Connor Neil	10/25/2018
ABDCMDL VOL077	ABDCMDL00319721	ABDCMDL00320231	Custodial files from Celia Weber	10/25/2018
ABDCMDL VOL078	ABDCMDL00320232	ABDCMDL00320238	Custodial files from Valerie Johnson	10/25/2018
ABDCMDL VOL079	ABDCMDL00320239	ABDCMDL00322576	Custodial files from Rita Norton	10/25/2018
ABDCMDL VOL080	ABDCMDL00322577	ABDCMDL00322856	Custodial files from Kristen Perkins	10/25/2018
ABDCMDL VOL081	ABDCMDL00322857	ABDCMDL00322977	Custodial files from David Breitmayer	10/25/2018
ABDCMDL VOL082	ABDCMDL00322978	ABDCMDL00323468	Custodial files from Matthew Hurless	10/25/2018
ABDCMDL VOL083	ABDCMDL00323469	ABDCMDL00323618	Custodial files from James Schuster	10/25/2018
ABDCMDL VOL084	ABDCMDL00323619	ABDCMDL00323656	Custodial files from Hillary Knepper	10/26/2018
ABDCMDL VOL085	ABDCMDL00323657	ABDCMDL00323822	Custodial files from John Bryant	10/26/2018
ABDCMDL VOL086	ABDCMDL00323823	ABDCMDL00323864	Custodial files from Ashley Moore	10/26/2018
ABDCMDL VOL087	ABDCMDL00323865	ABDCMDL00325800	Custodial files from Lisa Bowes	10/26/2018
ABDCMDL VOL088	ABDCMDL00325801	ABDCMDL00325940	Custodial files from Julie Hinman (Papa)	10/26/2018
ABDCMDL VOL089	ABDCMDL00325941	ABDCMDL00326923	Custodial files from Tennille Ashworth	10/26/2018
ABDCMDL VOL090	ABDCMDL00326924	ABDCMDL00327687	Custodial files from Ronald Kline	10/26/2018
ABDCMDL VOL091	ABDCMDL00327688	ABDCMDL00329092	Custodial files from Jill Jackson	10/26/2018
ABDCMDL VOL092	ABDCMDL00329093	ABDCMDL00331090	Custodial files from Sarah Read	10/26/2018
ABDCMDL VOL093	ABDCMDL00331091	ABDCMDL00336745	Custodial files from Joseph Tomkiewicz	10/26/2018
ABDCMDL VOL094	ABDCMDL00336746	ABDCMDL00337410	Custodial files from Carol Sherman-Hynes	10/26/2018
ABDCMDL VOL095	ABDCMDL00337411	ABDCMDL00343514	Custodial files from Carli Kissling	10/26/2018
ABDCMDL VOL096	ABDCMDL00343515	ABDCMDL00352181	Custodial files from Gregory Hamilton	10/26/2018
ABDCMDL VOL097	ABDCMDL00352182	ABDCMDL00355513	Custodial files from Marcelino Guerreiro	10/26/2018

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ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL098	ABDCMDL00355514	ABDCMDL00355516	April 17-18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County transactional data	10/31/2018
ABDCMDL_VOL099	ABDCMDL00355517	ABDCMDL00355864	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/2/2018
ABDCMDL_VOL100	ABDCMDL00355865	ABDCMDL00355865	April 18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County Order Monitoring Program data	11/2/2018
ABDCMDL_VOL101	ABDCMDL00355866	ABDCMDL00357737	Custodial files from Michael Bramowski	11/5/2018
ABDCMDL_VOL102	ABDCMDL00357738	ABDCMDL00358082	Custodial files from Patrick Lazaro	11/5/2018
ABDCMDL_VOL103	ABDCMDL00358083	ABDCMDL00359841	Custodial files from Brad Tallamy	11/5/2018
ABDCMDL_VOL104	ABDCMDL00359842	ABDCMDL00360337	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/6/2018
ABDCMDL_VOL105	ABDCMDL00360338	ABDCMDL00360352	Custodial files from Eric Cherveny previously withheld as part of ABDC's privilege review	11/8/2018
ABDCMDL_VOL106	ABDCMDL00360353	ABDCMDL00360356	Custodial files from Ed Hazewski previously withheld as part of ABDC's privilege review	11/8/2018
ABDCMDL_VOL107	ABDCMDL00360357	ABDCMDL00360396	Track One Customer Due Diligence Files	11/9/2018
ABDCMDL_VOL108	ABDCMDL00360397	ABDCMDL00360399	Custodial files from Amy Illig previously withheld as part of ABDC's privilege review	11/9/2018
ABDCMDL_VOL110	ABDCMDL00360404	ABDCMDL00362039	Custodial files collected from Sharon Hartman's hard drive	11/15/2018
ABDCMDL_VOL109	ABDCMDL00360400	ABDCMDL00360403	Tableau Files utilized by ABDC's Diversion Control Team	11/16/2018
ABDCMDL_VOL111	ABDCMDL00362040	ABDCMDL00364205	Custodial files from Paul Ross	11/16/2018
ABDCMDL_VOL112	ABDCMDL00364206	ABDCMDL00364266	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/16/2018
ABDCMDL_VOL113	ABDCMDL00364267	ABDCMDL00364390	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/28/2018

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ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Number	Description	Produced
ABDCMDL_VOL114	ABDCMDL00364391	ABDCMDL00364395	Document from custodial file of Kevin Kreutzer inadvertently withheld from prior production	11/28/2018
ABDCMDL_VOL115	ABDCMDL00364396	ABDCMDL00364399	Tableau Files utilized by ABDC's Diversion Control Team	11/29/2018